

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JEFF TITUS, individually;

Case No. 1:23-cv-00997-HYJ-SJB

Plaintiff,

Honorable Hala Y. Jarbou

v

Magistrate Judge Sally J. Berens

MICHAEL WERKEMA, in his individual capacity;
ROBERT CINABRO, as personal representative
of the Estate pf MICHAEL BROWN, in his individual
capacity; jointly and severally,

Defendants.

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**DEFENDANT ESTATE OF MICHAEL BROWN'S RENEWED MOTION FOR
SUMMARY JUDGMENT**

***** Oral Argument Requested *****

Defendant Robert Cinabro, as personal representative of the Estate of Michael Brown, moves for summary judgment under Fed. R. Civ. P. 56, for the reasons outlined in the attached renewed brief in support. Co-Defendant Michael Werkema is simultaneously filing a motion for summary judgment on his behalf, and this Defendant incorporates by reference the arguments made by co-Defendant as related to Count 1, the only claim remaining against the Estate of Michael Brown.

On Wednesday, February 26, 2025, counsel discussed the relief requested in this motion, in accordance with Local Rule 7.1. While the parties could not agree on all relief, Plaintiff's counsel did agree to dismissal of Count 2, the civil conspiracy claim. A separate stipulation will be filed.

Respectfully submitted,

ROSATI, SCHULTZ, JOPPICH & AMTSBUECHLER, P.C.

/s/ Andrew J. Brege

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Dated: May 5, 2025

PROOF OF SERVICE

I hereby certify that on May 5, 2025, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the attorneys of record listed herein.

Respectfully submitted,

ROSATI, SCHULTZ, JOPPICH & AMTSBUECHLER, P.C.

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Dated: May 5, 2025